

EXHIBIT Q (REDACTED)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:	Case No.
RESIDENTIAL CAPITAL, LLC, et. al,	12-12020 (MG)
Debtors.	

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VIDEOTAPE DEPOSITION OF MARK RENZI

New York, New York

November 7, 2012

1:08 p.m.

Reported by:
ERICA L. RUGGIERI, RPR
JOB NO: 27640

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MARK RENZI

A. We were presenting ranges.

Q. What was the high end of
debtors' range when Kathy Patrick was at
\$10 billion?

MR. RAINS: Same objection. No
foundation. Calls for speculation.

A. [REDACTED]

[REDACTED]

[REDACTED]

Q. [REDACTED]

A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. But at that point in time, to
the best of your recollection, the number
that debtors were presenting to Kathy
Patrick was less than \$8 billion, it was
7.8 billion; is that correct?

MR. RAINS: Calls for
speculation. No foundation.

MR. JURGENS: I'm asking for the
witness's recollection.

Q. Is it 7.08?

MARK RENZI

A. That's what -- yeah. Just say seven -- I would say 7.1 is what you are referring to in terms of the number but your question is the final -- I believe you asked me if I was there for the final part of the negotiations to arrive at 8.7 and I was not present for -- for that portion.

Q. But am I correct that the debtors were at 7.1, Kathy Patrick was at 10 and in some way they met at 8.7; is that correct?

MR. RAINS: Objection. Calls for speculation. No foundation.

Q. To the best of your understanding.

A. We were presenting a range. So we didn't present a number. I did not present a number, just as Kathy Patrick. I believe MoFo was the one describing the final portions of the negotiation. So you are asking me if it's one number. On May 8th we were presenting a range of numbers.

1 MARK RENZI

2 Q. Correct. But \$8.7 billion falls
3 outside that range that you presented to
4 Kathy Patrick on May 8th, correct?

5 A. Yes, it does.

6 Q. Did you do any subsequent
7 analysis after that May 8th analysis that
8 created ranges where the \$8.7 billion fell
9 within the range discussed with Kathy
10 Patrick?

11 A. I don't remember a specific
12 chronology at that point in time but
13 certainly we were evaluating other ranges
14 at that point in time.

15 Q. Did debtors' counsel ever ask
16 you to come up with an analysis to justify
17 settling at \$8.7 billion?

18 A. I would say debtors' counsel
19 said if you hold other levers constant,
20 what does that mean for an implied defect
21 rate.

22 Q. Was the total allowed claim that
23 was going to be agreed with Kathy Patrick
24 a lever in that analysis that you just
25 described?

1 MARK RENZI

2 A. Could you -- it --

3 Q. You just focused on the defect
4 rate. I know from reading e-mails that
5 Kathy Patrick's crew was very focused on
6 defect rates. My question is, did you
7 move -- let me withdraw that.

8 Was one of the levers that you
9 were moving to reach a 22 percent defect
10 rate --

11 A. I don't recognize 22 percent.

12 Q. The total allowed claim.

13 A. I don't recognize 22 percent.

14 Q. You don't recall Kathy Patrick
15 requesting a, that the final total allowed
16 claim reflect a 22 percent defect rate?

17 A. I recollect an \$8.7 billion
18 claim.

19 Q. Did anybody ask you to conduct
20 an analysis that would allow the debtors
21 to back into the \$8.7 billion number?

22 A. Well, we had done analyses prior
23 to the settlement based on the range of
24 defect rates that showed numbers higher
25 than \$8.7 billion.

MARK RENZI

Q. But not in the context of
presenting those ranges to Kathy Patrick,
correct?

A. Correct. We were in
negotiation -- we were negotiating. So in
the process of negotiating she had a
higher number and we had a lower number.
The information we presented was a range
of reasonable numbers to continue with
negotiations.

Q. Okay.

MR. JURGENS: I'll use the
balance of my time --

MR. RAINS: You've used eight
minutes of your five, so I don't think
you have more time.

MR. JURGENS: Well, Mr. Rains, I
believe there is one question.

MR. RAINS: Go ahead.

EXAMINATION BY

MR. DENMAN:

Q. Very quickly, Harrison Denman
from White & Case on behalf of the ad hoc
junior secured bondholders.